



localplan.snc@southnorfolkandbroadland.gov.uk
South Norfolk Place Shaping Team

Our ref:
PL00751046

Telephone 01223 582775

30 September 2024

Dear Mr Burgess

South Norfolk Village Clusters Local Plan Pre-Submission Addendum

Thank you for consulting Historic England on the South Norfolk Village Clusters Local Plan Pre-Submission Addendum. As a statutory consultee, our role is to ensure that the conservation of the historic environment is fully integrated into planning policy and that any policy documents make provision for a positive strategy for the conservation and enjoyment of the historic environment.

Our detailed comments are provided in the attached table. This response relates solely to the changes set out in the Addendum. Our comments in previous consultation responses still stand.

We welcome the completion of Heritage Impact Assessments for a number of sites. We also welcome many of the changes to policy wording in response to these.

We note that some sites are no longer being taken forward (e.g. SN0552Revc and SN0055).

We have highlighted a number of minor changes that we would recommend to make the policies sound.

Archaeology criterion still of concern

Our main remaining concern relates to the archaeology criterion for a number of sites. We recognise that the policy should be proportionate to the site size and heritage sensitivity.

However, as currently worded the criterion is not really clear about who needs to be consulted and what assessment needs doing when. The policy also fails to provide for up-front assessment to inform the design and layout of sites to protect any sensitive archaeology.





The principal issues relate to both clarity over consultation and also timing of any assessment (desk-based or field-based).

As currently drafted, the criterion could be read that an applicant simply has to look at the Historic Environment Record online and decide if they think it needs any further assessment prior to development.

Recommendations to address concern

We recommend use of the phrase 'Historic Environment Service' to make it clearer that the applicant needs to engage with the Service rather than simply look at the Historic Environment Record online. It will be for the Service to advise what if any archaeological work is needed and at what stage.

We recommend that the consultation with the HES should take place 'prior to application'. Then, if any assessment is needed (whether that be desk-based or field-evaluation) then the results of that can and should inform the design and layout of any application.

Finally, we recommend using the word 'assessments' rather than 'survey' to cover both desk-based assessments and field-based assessments.

We have therefore suggested some minor revised policy wording as follows:

Norfolk's Historic Environment Record Service is to be consulted prior to application to determine the need for any archaeological assessments.
~~surveys prior to development~~

The proposed revised wording seeks to address any ambiguity and ensures that, where appropriate, sufficient assessment (be that desk-based or in some circumstances where necessary field-based) is undertaken prior to application to inform the design and layout of the site and so avoid archaeology and protect in situ where possible.

Finally, in preparation of the local plan, we encourage you to draw on the knowledge of local conservation officers, the county archaeologist and local heritage groups.

Please note that absence of a comment on a policy, allocation or document in this letter does not mean that Historic England is content that the policy, allocation or document is devoid of historic environment issues.

We should like to stress that this response is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise as a result of this plan, where we consider that these would have an adverse effect upon the historic environment.

If you have any questions then please do get back to me.





Historic England

Yours sincerely

Debbie Mack
Historic Environment Planning Adviser
Debbie.Mack@HistoricEngland.org.uk



Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU
Telephone 01223 58 2749 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available.

